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January 7, 2012

VIA ELECTRONIC FILING

Hon. Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Joel Schwartz v. Credit Protection Association, L.P.
Docket No. CV-12-4602 (JG) (VVP)

Dear Judge Pohorelsky:

We have been recently retained by Defendant Credit Protection Association, L.P. ("CPA") in the above-referenced lawsuit, and write to respectfully request an enlargement of time to respond to Plaintiff's Class Action Complaint from December 26, 2012 to January 25, 2013. Due to our recent retention, we will need this additional time to review and investigate Plaintiff's allegations in compliance with our obligations under Rule 11 of the Federal Rules of Civil Procedure.

No prior request for an enlargement of time has been made by CPA. We have made several attempts to reach out to Plaintiff's counsel, in order to obtain his consent, if any, to Defendant's request. However, counsel has not responded to date.

We thank the Court for its consideration in this matter.

Respectfully submitted,
HINSHAW & CULBERTSON LLP

By: /s/ Concepcion A. Montoya
Concepcion A. Montoya (CM-7147)

cc: Maxim Maximov, Esq. (Via ECF)

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